

PATRICK L. FORTE, #80050
ANNE Y. SHIAU, #273709
LAW OFFICES OF PATRICK L. FORTE
One Kaiser Plaza, #480
Oakland, CA 94612
Telephone: (510) 465-3328
Facsimile: (510) 763-8354

Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:

Case No. 06-42460 RLE

GRACE MARIE BOONE,

Chapter 13

Debtor.

**MOTION TO MODIFY CHAPTER 13 PLAN;
NOTICE TO CREDITORS OF
DEADLINE TO REQUEST A HEARING**

The above-named debtor applies to the court for an order to modify her Chapter 13 Plan as follows:

Commencing September 2011, debtor will pay \$210.00 per month to the Trustee. Any plan arrearages shall be forgiven. Unsecured, non-priority creditors shall be paid on a pro-tanto basis.

The modification is sought on the following grounds:
Debtor recently moved. Debtor incurred costly moving expenses in the process of moving which prevented her from making her monthly Chapter 13 Plan payment. Debtor has started a new job which will allow her to continue making her ongoing Chapter 13 Plan payments.

NOTICE IS HEREBY GIVEN:

(i) That Local Rule 9014-1 of the United States Bankruptcy Court

1 for the Northern District of California prescribes the procedures to be
2 followed and that any objection to the requested relief, or a request for
3 hearing on the matter must be filed and served upon the undersigned
4 within twenty one (21) days of mailing of this notice;

5 (ii) That a request for hearing or objection must be accompanied
6 by any declarations or memoranda of law the party objecting or requesting
7 wishes to present in support of its position;

8 (iii) That if there is not a timely objection to the requested
9 relief or a request for hearing, the Court may enter an order granting
10 the relief by default; and

11 (iv) That the undersigned will give at least seven (7) days written
12 notice of hearing to the objecting or requesting party, and to any
13 trustee or committee appointed in the case, in the event an objection or
14 request for hearing is timely made.

15 Dated: September 20, 2011

16 /s/ Anne Y. Shiau
17 Anne Y. Shiau
18 Attorney for Debtor
19
20
21
22
23
24
25
26